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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

Cr. No. 10-147 (S-4) (SLT)

THOMAS PETRIZZO, *et al.*,

Defendants.
-----X

**DECLARATION BY CHRISTOPHER E. CHANG, ESQ.
IN OPPOSITION TO MOTION BY DEFENDANT
THOMAS PETRIZZO TO QUASH A SUBPOENA
DUCES TECUM DATED MARCH 2, 2012**

Christopher E. Chang, Esq. hereby declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at law duly admitted to practice before this Court. I am one of the attorneys representing defendant Michael Sciaretta in the above-entitled action. I submit this declaration in opposition to the motion by defendant Thomas Petrizzo ("Petrizzo") to quash a subpoena *duces tecum* dated March 2, 2012 issued to TD Bank.

2. Annexed hereto as **Exhibit "A"** are copies of 23 pages of a prior Rule 16 document production by the government as follows:

DX 61-000029351
DX 61-000029348
DX 61-000029512
DX 61-000029355-000029368
DX 61-000029487-0000491
DX 61-0000493.

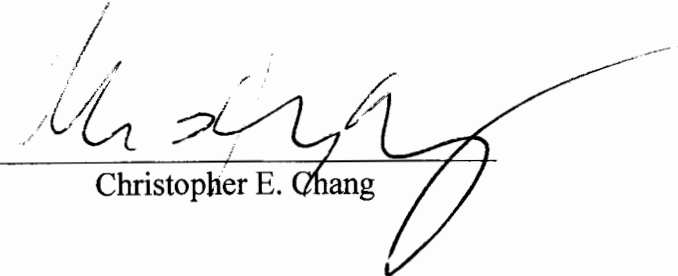
3. Annexed hereto as **Exhibit "B"** are copies of 7 pages of a prior Rule 16 document production by the government as follows:

DX 61-000029350
DX 61-000029349
DX 61-000029512
DX 000029352-000029354
DX-61-000029492.

4. For the reasons set forth in our accompanying memorandum, it is respectfully requested that Petrizzo's motion to quash be denied.

The foregoing declaration is made pursuant to 28 U.S.C. § 1746. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 29, 2012



Christopher E. Chang